

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION
CO. AND SEAFARERS INTERNATIONAL
UNION

Defendants

CIVIL NO. 98-1548 (CCC)
Consolidated with
CIVIL NO. 97-2437 (CCC)

STIPULATION OF DISMISSAL WITH PREJUDICE

TO THE HONORABLE COURT:

COME NOW Plaintiffs, Luis Alvarez and Miguel Vazquez, and defendants Crowley Towing and Transportation Co. and the Seafarers International Union of North America, Atlantic, Gulf, Lakes and Island Waters District, AFL-CIO, through their undersigned attorneys, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii) very respectfully state and pray as follows:

1. The parties have entered into a private Settlement and Release Agreement.
2. Defendants firmly and categorically deny all facts alleged in the Complaint.

Furthermore, Defendants affirmatively state that they reached the aforementioned Agreement solely to avoid incurring in additional costs, expenses and attorneys fees related to the litigation of the above captioned matter.

3. Pursuant to the terms of said Agreement, Plaintiffs Luis Alvarez and Miguel Vazquez hereby request this Honorable Court to dismiss with prejudice the consolidated Complaints filed in the above captioned cases without the imposition of costs, expenses or attorneys fees.

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4. The settlement this Stipulation of Dismissal with Prejudice makes reference to, the Release signed by the appearing parties, and this Stipulation for Dismissal only affect Plaintiffs Luis Alvarez and Miguel Vazquez, and no one else.

5. Defendants hereby consents to Plaintiffs' request for dismissal with prejudice of the Complaint filed in the above captioned consolidated cases without the imposition of costs, expenses or attorneys fees.

WHEREFORE, the parties respectfully request from this Honorable Court to dismiss with prejudice the consolidated Complaints in the present action without the imposition of costs, expenses or attorneys fees.

In San Juan, Puerto Rico, this 1st. day of April, 2005.

s/J.H. Zidell, Esq.
USDC-FL 0010121
300 71st St. #605
Miami Beach, FL 33141
Tel. (305) 865-6766 Fax (305) 865-7167

s/ Raquel M. Dulzaides, Esq.
USDC-PR 201406
JIMENEZ GRAFFAM & LAUSELL
P.O. Box 366104
San Juan, PR 00936-6104
Tel. (787) 767-1030/ Fax (787) 751-4068
usdccases@jgl.com

s/Ellen Silver, Esq.
USDC-MD 07548
Seafarers International Union
5201 Auth Way
Camp Springs, Maryland 20746-4275
Tel. (301) 899-0675/ Fax (301) 899-7355

s/Ana Rosa Biascoechea, Esq.
USDC-PR 119805
P.O. 195332
San Juan, PR 00919-5332
Tel. (787) 753-7772 Fax (787) 250-7772